

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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IRON MOUNTAIN INTELLECTUAL	)	
PROPERTY MANAGEMENT, INC.	)	
	)	
Interpleader-Plaintiff,	)	
	)	
v.	)	Civil Action
	)	No. 05-10018-RGS
FIDELITY INFORMATION	)	
SERVICES, INC., f/k/a	)	
ALLTEL INFORMATION SERVICES,	)	
INC., and TOYOTA MOTOR CREDIT	)	
CORPORATION,	)	
	)	
Interpleader-Defendants.	)	
	)	

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**MOTION FOR LEAVE TO FILE REPLY MEMORANDUM**

Interpleader-Defendant, Toyota Financial Services, Inc., respectfully moves, pursuant to Local Rule 7.1 (B)(3), for leave to file a seven-page reply memorandum (with supporting declarations), in support of its application for a temporary restraining order or preliminary injunction. The ground for this motion is that Fidelity has raised arguments in its opposition that warrant a response.

WHEREFORE, Toyota Financial Services, Inc., respectfully requests leave to file the accompanying reply memorandum and supporting declarations.

Dated: January 18, 2005

TOYOTA FINANCIAL SERVICES, INC.,

By its Attorneys,

s/David B. Chaffin  
BBO# 549245  
HARE & CHAFFIN  
160 Federal Street  
Boston, MA 02110  
(617) 330-5000

**CERTIFICATION OF CONSULTATION**

Pursuant to Rule 7.1(A) of the Local Rules of this Court, I certify that I attempted to confer with opposing counsel in an attempt to narrow or resolve the issues presented but was unable to do so.

s/David B. Chaffin